

OUTLINE FOR WQS ECONOMIC ANALYSES

COST-BENEFIT ANALYSIS ("CBA")

1. What is the Cost-Benefit Analysis?
 - a. Administrative Procedure Act (RCW 34.05.328)
 - b. Expected costs and benefits
 - c. Quantitative AND Qualitative
 - d. Reasonable standard
 - e. Change from existing regulation (baseline)
 - f. Preliminary and final
2. What is the baseline?
 - a. Situation if no rule change happens
 - b. Existing rules and laws
 - c. Existing National Toxics Rule criteria assumptions
 - d. Existing permitting guidelines
 - e. Existing listing policy
 - f. Existing compliance behavior
 - g. Expected growth in TMDLs
 - h. Expected growth in dischargers
3. What does the rule do?
 - a. New criteria; assumptions and changes to equation
 - b. Implementation tools
4. Who is impacted?
 - a. The public and tribes
 - b. Dischargers
 - c. Environment
5. Cost estimates and discussion
 - a. Costs to dischargers on unlisted water bodies
 - b. Costs to dischargers on 303(d)-listed water bodies with no TMDL
 - c. Costs to dischargers on 303(d)-listed water bodies with a TMDL
 - d. Costs to human health
 - e. Costs to the environment
 - f. Staff costs
6. Benefits
 - a. Benefits to human health
 - b. Benefits to the environment
 - c. Benefits to tribal populations
 - d. Benefits to dischargers
 - e. Non-use benefits
 - f. Correlated benefits

7. Comparison of Costs and Benefits
 - a. Quantitative and qualitative
 - b. Sensitivity analysis
 - c. Notes on results
 - d. Conclusion: Do the likely benefits of the rule exceed the likely costs?

LEAST-BURDENSOME ALTERNATIVE ANALYSIS (same document as CBA)

1. What are the goals and objectives of the authorizing statutes?
2. Alternatives considered
3. Alternatives not included in the rule language
 - a. Greater burden
 - b. Does not meet goals and objectives

SMALL BUSINESS ECONOMIC IMPACT STATEMENT ("SBEIS")

1. What is the SBEIS?
 - a. Regulatory fairness act (Chapter 19.85 RCW)
 - b. Are costs to businesses disproportionate?
 - c. What industries are impacted (NAICS)?
 - d. What are the jobs impacts to the state?
2. Compliance costs from CBA
3. Limit to costs to private businesses
4. Small businesses = 50 or fewer employees
5. Employment through highest ownership level
6. Compare cost/employee of small and largest 10 percent
7. If disproportionate, reduce disparity
8. Listing of impacted industries
9. Jobs impacts